

Remarks

Claims 1-17 are now pending in this application. Applicants have amended claims 1-3 and 8 and present new claims 9-17 to clarify the claimed invention. Applicants respectfully request favorable reconsideration of this application.

Applicants have amended the specification to delete reference to the claims.

Applicant submits herewith two sheets of corrected drawings in which Applicant has corrected which elements are identified by reference characters 5 and 7 in Figs. 3-5. These corrections make are consistent with the other figures and with the description in the specification. Applicant respectfully requests entry of the corrected drawings.

The Examiner rejected claims 1-5 under 35 U.S.C. § 102(b) as being anticipated by U.S. patent 6,125,715 to Nissfolk. The Examiner rejected claims 6 and 7 under 35 U.S.C. § 103(a) as being unpatentable over Nissfolk. The Examiner rejected claim 8 under 35 U.S.C. § 102(b) as being anticipated by or under 35 U.S.C. § 103(a) as being unpatentable over Nissfolk.

Nissfolk does not disclose the invention recited in claim 1 since, among other things, Nissfolk does not disclose an industrial robot that includes a cable extending through an internal cavity from a first contact/securing point to a second contact/securing point wherein the internal cavity accommodates an excess of cable moving between slack and tension as the first contact/securing point and the second contact/securing point move relative to each other. Rather,

Nissfolk discloses a device for supporting and guiding a cable that includes a holding element to which the cable is fixed. The fixing device is screwed onto the outer end of the robot arm. Tensioning straps are used to clamp the cables in place on the holding element. The cable is coiled in a screw-line shape on the holding element.

Nissfolk discloses a structure that includes two spaces sealed from each other by a separation element. The wall of the separation element includes passages through which the cable is guided. A second of the spaces includes a portion in which the cable extends substantially perpendicularly relative to the axis of rotation between an assembly and an arm part. The second space is delimited from the assembly by the separation element and one or more cover members arranged on the assembly.

Wiring the device disclosed by Nissfolk is time-consuming as the cable has to be guided through the device and attached to the holding element, which then has to be mounted on the robot arm. The cable must then be fed through the second space and connected to the assembly whereupon the separation element has to be affixed to the inner walls of the assembly. Disassembly is likewise complicated and time consuming. The use of such a device leads to longer maintenance/repair times thereby decreasing productivity and increasing production costs.

Furthermore, industrial robots typically work in and/or access small or confined spaces. A housing for coil of cable and a cable-guiding device requires a relatively large amount of space. Such space is only available to a limited extent particularly in the vicinity of a highly mobile robot hand. Incorporating a cable-guiding device into the robot hand also increases the

weight of the robot hand.

The Examiner asserts that Nissfolk discloses that at least one cable (35) is connected to at least one of the parts (6 or 2) via a releasable contact point (40a, 40b, 41, 55) that is located inside the internal cavity. In reality, in the passage starting at col. 3, line 53, Nissfolk discloses how the cables are mechanically secured at a place 40 adjacent to the fork-like outer end of the arm part 2. The cables are fixed relative to the arm part 2 at two fixing points 40a and 40b, by securing members 41, such as bundle straps. In other words, Nissfolk discloses how the cables are mechanically secured. However, this is not the same as if a cable is 1 "connected" to the part and via 2 "a releasable contact point". For a cable to be mechanically secured does not mean that it is connected, and neither does mechanically secured at a fixing point mean that there is a releasable contact point via which the cable is connected.

In view of the above, Nissfolk does not disclose all elements of the invention recited in claims 1-5. Since Nissfolk does not disclose all elements of the invention recited in claims 1-5, the invention recited in claims 1-5 is not properly rejected under 35 U.S.C. § 102(b). For an anticipation rejection under 35 U.S.C. § 102(b) no difference may exist between the claimed invention and the reference disclosure. *See Scripps Clinic and Research Foundation v. Genentech, Inc.*, 18 U.S.P.Q. 841 (C.A.F.C. 1984).

Along these lines, anticipation requires the disclosure, in a cited reference, of each and every recitation, as set forth in the claims. *See Hodosh v. Block Drug Co.*, 229 U.S.P.Q. 182 (Fed. Cir. 1986); *Titanium Metals Corp. v. Banner*, 227 U.S.P.Q. 773 (Fed. Cir. 1985); *Orthokinetics, Inc. v.*

Safety Travel Chairs, Inc., 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986); and *Akzo N.V. v. U.S. International Trade Commissioner*, 1 U.S.P.Q.2d 1081 (Fed. Cir. 1986).

Nissfolk does not suggest the invention recited in claims 6 and 7 since, among other things, Nissfolk does not suggest an industrial robot that includes a cable extending through an internal cavity from a first contact/securing point to a second contact/securing point wherein the internal cavity accommodates an excess of cable moving between slack and tension as the first contact/securing point and the second contact/securing point move relative to each other. Whether or not Nissfolk suggests an electric motor, Nissfolk does not suggest the structure of the industrial robot recited in claim 1, from which claim 6 depends. Additionally, Nissfolk does not suggest an internal cavity as recited in claim 1 or an excess of cable extending between a first contact/securing point to a second contact/securing point within an internal cavity. Therefore, Nissfolk does not suggest the invention recited in claims 6 and 7 and Applicants respectfully request withdrawal of this rejection.

Nissfolk does not suggest the invention recited in claim 8 since, among other things, Nissfolk does not suggest an industrial robot that includes a cable extending through an internal cavity from a first contact/securing point to a second contact/securing point wherein the internal cavity accommodates an excess of cable moving between slack and tension as the first contact/securing point and the second contact/securing point move relative to each other. Therefore, Nissfolk does not suggest a method of connecting at least part of at least one cable between a first part and a second part of an industrial robot as recited in claim 8 and Applicants respectfully request withdrawal of this rejection.

Furthermore, a disadvantage of the structure suggested by Nissfolk is that the structure requires a space for the cable and a contact behind the motor. Embodiments of the claimed invention can eliminate the need for such a space. As a result, a corresponding space in a structure according to embodiments of the claimed invention can be used, for example, to house a larger motor, which may be desirable. Alternatively, rather than increasing a size of the motor, the tilt housing could be made smaller and more compact. Additionally, embodiments of the claimed invention provide the possibility to have a contact on "top of the motor". This can make the contact easily accessible.

In view of the above, the reference relied upon in the office action does not disclose or suggest patentable features of the claimed invention. Therefore, the reference relied upon in the office action does not anticipate the present invention or make the present invention obvious. Accordingly, Applicants respectfully request withdrawal of the rejections based upon the cited reference.

In conclusion, Applicants respectfully request favorable reconsideration of this case and early issuance of the Notice of Allowance.

If an interview would advance the prosecution of this case, Applicants urge the Examiner to contact the undersigned at the telephone number listed below.

The undersigned authorizes the Commissioner to charge fee insufficiency and credit

overpayment associated with this communication to Deposit Account No. 22-0261.

Respectfully submitted,

Date: January 13, 2009

/Eric J. Franklin/

Eric J. Franklin, Reg. No. 37,134
Attorney for Applicants
Venable LLP
575 7th Street, NW
Washington, DC 20004
Telephone: 202-344-4936